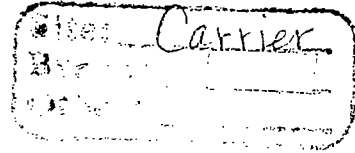


U. S. ENVIRONMENTAL PROTECTION AGENCY
REGION IV, ATHENS, GEORGIA



MEMORANDUM

DATE: **MAR 23 1990**

SUBJECT: Comments on Carrier Air Conditioning Site Phase I RI/FS Report,
Collierville, Tennessee; ESD Project Number 90E-306

FROM: Donald Hunter, Hydrogeologist *Donald Hunter*
Hazardous Waste Section
Environmental Compliance Branch
Environmental Services Division

TO: Beth Brown, RPM
North Site Management Section
Superfund Branch
Waste Management Division

THRU: M. D. Lair, Chief *M. D. Lair*
Hazardous Waste Section
Environmental Compliance Branch
Environmental Services Division

The subject report has been reviewed as requested. Aside from some severe format irregularities in the text and in several of the data summary tables, the report is a very clear presentation of sampling results from the Phase I work conducted at the site and it's degree of validation of the work previously conducted at the site. Because the historical data was not included with the report, complete concurrence with all of the executive summary conclusions cannot be given. These conclusions are listed with bullets on page one of the summary and are listed below with my response.

- "The site constituents are trichloroethylene and its degradation product, 1,2-dichloroethylene."

Response: This appears to be generally a true statement, as these were, except for several lab contaminants, about the only compounds detected over the site in soils and ground water. Upon completion of the anticipated background soils investigation, zinc and other sludge-related compounds associated with the former surface impoundment should be re-evaluated as possible contaminants.

- "Groundwater data from prior investigations was consistent with Phase I (CLP equivalent) data and will be used in the RI/FS."

Response: Without the historical ground-water data, I cannot determine whether or not this data is consistent with the CLP quality data generated from the Phase I ground-water sampling.



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- "Soil screening method data from prior investigations does not correlate well with CLP equivalent data. Therefore data from the screening method must be used with caution."

Response: In general, I agree with this statement. However, it is interesting to note that virtually all of the screening data was higher than the CLP data. If the screening data was generated from on-site analysis of soil samples immediately after collection, the higher values could be valid and more indicative of actual concentrations than samples that were collected, bottled, shipped to a lab and held several days prior to analyses.

- "No semi-volatile or pesticide constituents have been detected. Therefore tests for these constituents will be discontinued."

Response: Since the historical ground-water data, as well as the soil boring data generally indicates that these compounds are not present, it would be reasonable to forgo these analyses on most future samples.

- "Metals data was inconclusive due to the absence of background data. Therefore metals tests will be continued for all media on a limited basis while background data is being compiled."

Response: I agree. Background data is badly needed to evaluate all existing on-site data, particularly zinc results. The higher concentrations of zinc in ground water may very well be attributable to galvanized casing, but this needs to be ascertained with some valid scientific basis.

Other comments:

- 1 p.5/Sec. 1.2 Prior Investigations - Were any of the six borings completed in 1981 in the area of the 1979 spill completed within this area or were they completed, literally, as this section says, "...around the known area of the spill."?
- 2 p.17/Sec. 2.2 TCL/TAL Compound Data Results - I would not be so amazed at the presence of the noted volatile organic compounds in the sample collected from the 6-foot to 10-foot interval. Most can be associated with the spill and the asphaltic composition of the parking lot surface on to which the spill occurred. Its isolated occurrence at this depth could easily be due to migration from a location off to the side of the boring through a root channel or other conduit.

Please call me at FTS 250-3351 if you have any questions regarding these comments.

cc: Finger/Wright
Lair/Bokey
Knight